

**REMARKS**

Favorable reconsideration of this application in light of the following discussion is respectfully requested.

Claims 1-20 are pending in the present application. No claims have been amended, added or canceled by the present amendment.

In the outstanding Office Action, claims 1-20 were rejected under 35 USC § 103(a) as unpatentable over Chiba in view of Veilleux, which is respectfully traversed.

Applicants respectfully submit the conception date of the present application occurred on September 16, 1999, along with due diligence from the date of conception to filing of the present application. Accordingly, a 37 C.F.R. § 1.131 declaration along with the appropriate evidence will be filed in due course. Further, the conception date of the present application is prior to the filing date of Veilleux. Thus, Applicants respectfully submit Veilleux is not a valid reference.

In addition, Applicants also respectfully submit dependent 7 further defines over the combination of Chiba in view of Veilleux. In more detail, dependent claim 7 further clarifies that the method is executed by consulting a rule base. Thus, the claimed invention provides an optimized document management system by executing a systematic process of performing tradeoffs based on consulting a rule base (see paragraphs [0010] and [0051] of the present application).

On the contrary, Veilleux uses the same concept as described in paragraphs [0002] and [0006] of the related art of the present application. Veilleux also discloses using an intermediate format, but does not teach or suggest forming a systematic process carrying out a trade-off given

a rule base, and thus Veilleux does not teach or suggest anything about optimizing management of documents through a trade-off procedure using a rule base.

Further, Chiba discloses that user involvement is required for conversion. On the contrary, and as described in the previous response, conversion in the present application is performed automatically based on an idiosyncratic destination profile of the destination apparatus. Chiba also does not teach or suggest selecting a tradeoff between first converting and then storing or first storing and then converting.

Further, with regard to dependent claim 7, the Office Action relies on item 19 in Fig. 10 of Chiba. However, this cited section does not teach or suggest a rule base for automatically and systematically performing tradeoffs to optimize the storage system. Item 19 in Fig. 10 of Chiba is only described as an operation instruction unit. There is no further description regarding item 19 in Chiba.

Accordingly, neither Chiba nor Veilleux teach or suggest the rule based features in dependent claim 7.

Accordingly, it is respectfully submitted independent claims 1 and 18 and each of the claims depending therefrom are allowable.

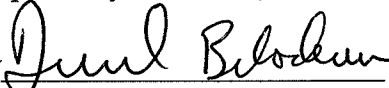
**Conclusion**

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact David A. Bilodeau Reg. No. 42,325 at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.14; particularly, extension of time fees.

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Respectfully submitted,

By   
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